



October 8, 2003

Water Docket  
Environmental Protection Agency  
Mail Code 4101T  
1200 Pennsylvania Ave., NW.  
Washington, DC 20460

Attention Docket ID No. OW-2003-0065

RE: Applicability of the Safe Drinking Water Act to Submetered Properties  
Federal Register: August 28, 2003 (Volume 68, Number 167)

Dear Sir or Madam:

I am writing you in support of the EPA's recent proposal to revise the current policy regarding submetering of residential properties. Water continues to be a major concern in many areas. As shortages loom, it is important to take every measure possible to conserve water.

It is widely known that submetering apartments provides several benefits and conserves water. It allows each consumer to appreciate the impact of water usage by directly seeing the associated costs. In addition, this service can more quickly identify leaks, such as a leaky toilet, which can waste up to 200 gallons of water a day. Studies have indicated that submetered properties use between 18 and 39% less water than properties that include water in the rent.

While it is widely accepted that submetering does promote water conservation, the EPA is not completely encouraging this practice due to the regulatory burden associated with it. Currently, the EPA views community submetering as "selling" water. We feel that submetering to allocate water usage is a simple and efficient method to pass the appropriate costs on to the actual users. At this time, communities must comply with public water system (PWS) regulations which require periodic water testing among other things. This testing provides little to no benefit to anyone due to the fact that the water is actually being purchased from a PWS that does its own testing and because the apartment properties cannot alter or treat the water.

In reference to the EPA's concern for the security of water, we feel that the delivery of water to apartment communities is similar to single family homes. When the systems are installed they are subject to regulations and inspected prior to being placed in service. They then function just as connections do with single family residences.

Wood Partners has built over 13,000 apartment units since its inception in 1998 and we firmly believe in submetering for water conservation. While submetering does pass the cost of water onto the direct user, it

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does not relieve the property owners from all associated costs. Landlords cannot recover all the costs associated with water and submetering and therefore will always have a stake in water efficiency. As a result, this change would not keep us from installing water efficient appliances.

The EPA acknowledges that submetering has a large impact on water efficiency, and since water efficiency is one of the EPA's four pillars in their strategy to make the nation's water infrastructure sustainable they should be doing all that they can to encourage submetering. It is with these facts in mind that I urge you to revise your current policy regarding submetering of residential properties

Sincerely,

James R. Simpson

CC: Ken Szymanski